

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS
Civil Action Number: 2005 CV 10488 JLA

TIMOTHY HILLS,

Plaintiff

vs.

TOWN OF STOUGHTON,
DAVID M. COHEN, Individually and
MANUEL CACHOPA, Individually

Defendants

JOINT MOTION TO CONTINUE STATUS CONFERENCE

The parties jointly move this court to continue the status conference scheduled for December 20, 2007 to a date in late March 2008. As grounds for this motion, the parties state as follows:

1. Discovery in this matter has been stayed pending the outcome of the criminal trials of the defendants Manuel Cachopa and David Cohen.
2. A status hearing for defendant Manuel Cachopa's trial in the Norfolk Superior Court is being scheduled for late February 2008.
3. Defendant David Cohen is currently appealing the outcome of his criminal trial.
4. Due to the pending criminal matters and potential Fifth Amendment privilege concerns, the court issued a protective order for the defendants.
5. The parties agreed the plaintiff need not respond to discovery until the criminal matters are resolved.
6. The parties agree that the matter should be stayed pending the outcome of the criminal matters.

Wherefore, the parties request this court reschedule the status conference in this matter for some date in late March 2008.

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